

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

RE: NAZAR CHOLACH)	Case No. 23 B 05510
)	
)	Chapter 13
Debtor(s))	
)	Judge: TIMOTHY A BARNES

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW Thomas H. Hooper, Chapter 13 Trustee duly appointed to administer the instant case ("Trustee"), and hereby OBJECTS to confirmation of the Chapter 13 plan filed by Debtor(s), in advance of the confirmation hearing set for July 13, 2023 10:30 am, for the following:

Debtor has failed to provide copies to the Trustee of the most recently filed tax returns in accordance with 11 U.S.C. §§ 521(e)(2)(A)(i), and 1325(a)(1). Debtor to provide missing 2022 tax returns.

Debtor has failed to provide copies of 60 days of pay advices and/or other evidence of income in accordance with 11 U.S.C. §§ 521(a)(1)(B), 1325(a)(1). Debtor to provide proof of business income.

Debtor has failed to pay post-petition Domestic Support Obligations in accordance with 11 U.S.C. § 1325(a)(8). Pursuant to correspondence, the debtor is delinquent with post-petition domestic support obligations. Pursuant to 11 U.S.C. § 1325(a)(8), the plan may not be confirmed until the debtor shows evidence that such obligations are current and up to date.

Debtor has failed to complete the following sections of the plan as required by 11 U.S.C. §§ 1325(a)(1):

Section 4.4- debtor to provide correct amount for priority claims.

Section 4.5- debtor to address domestic support obligations.

The Trustee requests debtor's Chase personal and business account statements for 12 months prior to filing. Disposable income under 11 U.S.C. 1325(b) cannot be determined until this is resolved.

Debtor has failed to properly fill out schedules in accordance with 11 U.S.C. §§ 521(a)(1)(B)(i). Debtor to amend petition to provide debtor's correct residential address. Debtor also to amend Schedule I to provide correct amount of monthly earnings.

WHEREFORE, the Trustee prays the Court to enter an Order denying confirmation of the proposed Chapter 13 plan, and for such other and further relief as the Court may deem just and proper. In the alternative, the Trustee requests a hearing on the matter.

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

RE: NAZAR CHOLACH

Debtor(s)

Dated: July 07, 2023

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Case No. 23 B 05510

Chapter 13

Judge: TIMOTHY A BARNES

/s/ Thomas H. Hooper

Thomas H. Hooper
Chapter 13 Trustee
55 E. Monroe St., Suite 3850
Chicago, IL 60603
(312) 294-5900

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CERTIFICATE OF SERVICE

I, Kelleye Robinson, do hereby certify that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and that on the date indicated herein below, I served copies of the foregoing TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN by depositing a copy of the same in a postage-paid envelope with the United States Postal Service or by electronic means, as indicated.

DAVID FREYDIN <i>Attorney for Debtor</i>	(via CM/ECF)
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Patrick Layng United States Trustee	(via CM/ECF)
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NAZAR CHOLACH 2500 WINDSOR MALL DR #1A PARK RIDGE, IL 60068 <i>Debtor</i>	(via U.S. Postal Service)
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Dated: July 07, 2023

/s/ Kelleye Robinson

Kelleye Robinson
Office of the Chapter 13 Trustee
55 E. Monroe St., Suite 3850
Chicago, IL 60603
(312) 294-5900